

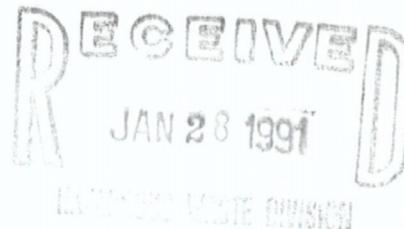


Weyerhaeuser Paper Company

Longview, Washington 98632
(206) 425-2150

January 21, 1991

Charles E. Findley, Director
Hazardous Waste Division
Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, WA 98701



Dear Mr. Findley:

I am writing to inform you about the discovery of a hazardous substance in the environment at the Weyerhaeuser Company facility in Longview, Washington. While we have not decided conclusively that reporting under CERCLA Section 103(c) is required, we felt it was prudent to make you aware of this situation.

During the recent demolition of a sulphite pulp mill, originally constructed in 1931 and operated through 1978, we discovered that some of the process vessels contained refractory materials which had from <10 - 67,000 mg/kg total lead, and which often failed the TCLP test for lead. Following that discovery, we decided to examine the resident soil in the sulphite mill process area for possible hazardous characteristics. Based upon knowledge of the kinds of materials used in the area, we tested the soil for TCLP metals, corrosivity, and reactivity. The sampling results indicated that lead was the only contaminant of concern, but total lead levels were an order of magnitude lower than that in the process vessels, and few samples failed the TCLP test for lead (see Attachment 2 for soil sampling results). Although the relationship between the lead in the process vessels and in the soil is not clear, we felt it was prudent to notify both EPA and DOE about this discovery.

For your information, we have contracted with a licensed hazardous waste demolition contractor, working under the direction of an environmental engineering consulting firm, to complete the demolition of the sulphite mill structures. The waste from that demolition activity which has been designated as hazardous has been and will continue to be disposed in a chemically secure landfill. We have also contracted with another hazardous waste remediation contractor, also working under the direction of an environmental engineering consulting firm, to remove lead-contaminated soils from this area. These soils will be evaluated to ensure proper designation, and all hazardous waste will be disposed in a chemically secure landfill. All demolition debris or contaminated

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soil which designates as state-only dangerous waste will be disposed of in accordance with Washington State Dangerous Waste Regulations.

I have included, as Attachment 2, data on some of the soil samples which have been analyzed so far. Many other samples have been taken and analyzed, but those results are not yet available in final form. Included in that soil data is information which indicates that, although we have no knowledge at this time that groundwater has been impacted, a few samples of soil in contact with the seasonal high groundwater table did contain relatively low levels of lead contamination. We will send a complete report on soil analysis, removal, and disposition as soon as it is available.

Airborne lead in the demolition workspace was measured during dismantling of lead-contaminated structures. Very low levels, often below analytical detection limits, were found there. Demolition workers wore, and will continue to wear all appropriate personal protective equipment, including full-face supplied air respirators in most cases, while working around lead-contaminated materials. We will also submit information about air monitoring results in the report mentioned above when they are finalized.

Thank you for your attention to this matter. Please do not hesitate to call me at (206)425-2150 ext. 6024 should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "David P. Farris". The signature is fluid and cursive, with the first name "David" being more prominent.

David P. Farris
Senior Environmental Engineer

cc: Richard Burkhalter, DOE
George Houck, DOE
Carol Flakes, DOE
Greg Bean, DOE